

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	
)	
1998 Biennial Regulatory Review –)	CC Docket No. 98-171
Streamlined Contributor Reporting)	
Requirements Associated with Administration)	
of Telecommunications Relay Service, North))	
American Numbering Plan, Local Number)	
Portability, and Universal Service Support)	
Mechanisms)	
)	
Telecommunications Services for Individuals)	CC Docket No. 90-571
with Hearing and Speech Disabilities, and the)	
Americans with Disabilities Act of 1990)	
)	
Administration of the North American)	CC Docket No. 92-237
Numbering Plan and North American)	NSD File No. L-00-72
Numberings Plan Cost Recovery Contribution)	
Factor and Fund Size)	
)	
Number Resource Optimization)	CC Docket No. 99-200
)	
Telephone Number Portability)	CC Docket No. 95-116
)	
Truth-in-Billing and Billing Format)	CC Docket No. 98-170

**REPLY COMMENTS OF
THE UNITED STATES TELECOM ASSOCIATION**

Lawrence E. Sarjeant
Indra Sehdev Chalk
Michael T. McMenamin
Robin E. Tuttle

1401 H Street, NW, Suite 600
Washington, D.C. 20005
(202) 326-7300

April 18, 2003

TABLE OF CONTENTS

<u>SUMMARY</u>	i
I. INTRODUCTION	2
II. <u>DISCUSSION</u>	3
<u>A. The Hybrid Connections-Based Mechanism Would Assess Carriers Providing Both Access and Transport Based on Connections and Carriers Providing Transport Only Based on Revenues.</u>	3
<u>B. A Revenues-Based Mechanism will not Ensure Sustainability of the Federal Universal Service Fund.</u>	5
<u>C. The Hybrid Connections-Based Mechanism is the Best Means of Ensuring Equitable and Nondiscriminatory Assessments on all Providers of Telecommunications Services and Sustainability of the Universal Service Fund.</u>	6
<u>D. Contributions Based on the Price Elasticity of Carriers' Interstate Telecommunications Services is Inappropriate</u>	8
<u>E. The Hybrid Connections-Based Mechanism Does Not Require IXCs to Incur Additional Billing Costs.</u>	10
III. <u>CONCLUSION</u>	11

SUMMARY

The universal service contribution mechanism that USTA advocates is a hybrid connections-based mechanism that would assess carriers providing both switched local access and switched interstate transport based on connections, assess carriers only providing switched local access based on connections, and assess carriers providing only switched interstate transport based on revenues. This hybrid connections-based mechanism is currently the best mechanism among proposed options for ensuring that every provider of telecommunications and telecommunications services contributes to universal service support on an equitable and nondiscriminatory basis and for ensuring sufficient universal service funding.

A universal service collections mechanism based solely on interstate revenues cannot ensure sustainability of the universal service fund. Bundling and substitution of services are making distinctions between interstate and intrastate revenues unworkable as the basis for collecting universal service support. Universal service contributions mechanisms based on telephone numbers or physical connections that only assess a flat fee per connection are unworkable because, contrary to Section 254(d) of the Communications Act, they relieve certain carriers of their obligation to contribute to universal service. While there may be no perfect contribution mechanism, the hybrid connections-based mechanism is the best mechanism among those under consideration in this proceeding.

The FCC must adopt a USF contribution mechanism that ensures that all providers of retail interstate telecommunications and telecommunications services, including broadband providers, are required to contribute to universal service and that they contribute in an equitable and nondiscriminatory manner.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	
)	
1998 Biennial Regulatory Review --)	CC Docket No. 98-171
Streamlined Contributor Reporting)	
Requirements Associated with Administration)	
of Telecommunications Relay Service, North)	
American Numbering Plan, Local Number)	
Portability, and Universal Service Support)	
Mechanisms)	
)	
Telecommunications Services for Individuals)	CC Docket No. 90-571
with Hearing and Speech Disabilities, and the)	
Americans with Disabilities Act of 1990)	
)	
Administration of the North American)	CC Docket No. 92-237
Numbering Plan and North American)	NSD File No. L-00-72
Numberings Plan Cost Recovery Contribution)	
Factor and Fund Size)	
)	
Number Resource Optimization)	CC Docket No. 99-200
)	
Telephone Number Portability)	CC Docket No. 95-116
)	
Truth-in-Billing and Billing Format)	CC Docket No. 98-170

**REPLY COMMENTS OF
THE UNITED STATES TELECOM ASSOCIATION**

Pursuant to sections 1.415 and 1.419 of the rules of the Federal Communications Commission (FCC),¹ the United States Telecom Association (USTA),² through the undersigned hereby submits its reply to the comments filed in the proceeding docketed above.

¹ 47 U.S.C. §§ 1.415 and 1.419.

² USTA is the nation's oldest trade organization for the local exchange carrier industry. USTA's carrier members provide a full array of voice, data, and video services over wireline and wireless networks.

I. INTRODUCTION

In its Report and Order and Second Further Notice of Proposed Rulemaking,³ the FCC sought comment on a revenues-based contribution proposal and three connections-based contribution proposals with several variations. While a number of commenters supported continued use of a revenues-based mechanism and some supported a telephone number-based mechanism, many others, including USTA, recognized the need for some type of connections-based mechanism. The connections-based mechanism for contributions to the universal service fund supported by USTA is a hybrid mechanism that would assess carriers providing both switched local access and switched interstate transport based on connections, assess carriers providing switched local access only based on connections, and assess carriers providing switched interstate transport only based on revenues. A carrier that provides nonswitched connections either to interstate private lines or switched interstate long distance services would contribute to universal service by multiplying the number of network connections by a full connection unit by the factor assigned for the bandwidth capacity. USTA refers to this as the hybrid connections-based mechanism.⁴ The hybrid connections-based mechanism is a means of ensuring that all participants in the interstate telecommunications market contribute to the federal universal service fund (universal service or USF) in an equitable and nondiscriminatory manner

³ *Federal-State Joint Board on Universal Service; 1998 Biennial Regulatory Review – Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Service, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms; Telecommunications Services for Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990; Administration of the North American Numbering Plan and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size; Number Resource Optimization; Telephone Number Portability; Truth-in-Billing and Billing Format, Report and Order and Second Further Notice of Proposed Rulemaking*, CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, 98-170, NSD File No. L-00-72 (rel. Dec. 13, 2002) (Second Further Notice).

⁴ See USTA Comments at 4. USTA advocates the second variation of the connections-based mechanism set forth in the Second Further Notice at ¶ 92.

as required by section 254(d) of the Telecommunications Act of 1996 (the 1996 Act).⁵ In the telecommunications market of the twenty-first century, voice telephony is not the sole domain of incumbent local exchange carriers. More and more Americans use their cell phones as a substitute for their traditional wireline telephone. The cable industry is adding new voice and broadband customers each month. Internet protocol (IP) telephony is commercially available. As the providers of voice and data services continue to diversify, so too must the pool of contributors to universal service. USF contributions by a broad, diverse group of telecommunications and telecommunications services providers works best when administered in accordance with this hybrid connections-based mechanism because it minimizes the contribution required of each contributor, spreads the responsibility to support universal service equitably and ensures that the federal universal service support mechanism is both sustainable and sufficient into the future.

II. DISCUSSION

A. The Hybrid Connections-Based Mechanism Would Assess Carriers Providing Both Access and Transport Based on Connections and Carriers Providing Transport Only Based on Revenues.

All carriers do not offer both switched local access and switched interstate transport nor do they always capture a customer for the provision of both access and transport when they offer both services. As a result, there is a need for the bases of universal service contributions to be split between connections and revenues. The hybrid connections-based mechanism assesses connections-based contributions on three components: the number of connections to the network,

⁵ Section 254(d) provides, “Every telecommunications carriers that provides interstate telecommunications services shall contribute, on an equitable and nondiscriminatory basis, to the specific, predictable, and sufficient mechanisms established by the Commission to preserve and advance universal service.” 47 U.S.C. § 254(d).

a connection unit that is assigned a monetary value,⁶ and the multiple of units (or a factor) assigned to the service provided (*i.e.*, based on the bandwidth capacity of the service). A carrier providing both switched local service (access) and switched long distance service (transport) to an end-user would contribute to universal service by multiplying the number of network connections by a full connection unit by the factor assigned for the bandwidth capacity of the service purchased. A carrier providing only access to an end-user would contribute to universal service by multiplying the number of network connections by one half of a full connection unit by the factor assigned for the bandwidth capacity of the service purchased. A carrier providing only transport to an end-user would contribute to universal service based on a percentage of its interstate retail revenues. Likewise, a carrier providing occasional-use interstate telecommunications services (e.g., dial-around long distance service, prepaid calling card long distance service, or long distance operator service) would contribute to universal service based on a percentage of its interstate retail revenues. Finally, a carrier providing non-switched connections either to interstate private line services or to switched long distance services would contribute to universal service by multiplying the number of network connections by a full connection unit by the factor assigned for the bandwidth capacity of the service purchased.⁷ As Qwest Communications International Inc. (Qwest) points out, the benefit of this hybrid connections-based proposal is that “it would shift the current contribution methodology to a connection basis for all end user access connections and presubscribed long distance, where bundling is most likely to occur.”⁸ In addition, Qwest says, “instead of adopting broad exemptions from contribution requirements, the proposal would continue to collect contributions

⁶ USTA is not advocating, at this time, any particular monetary value that should be assigned for a contribution unit.

⁷ USTA Comments at 7-9.

⁸ Qwest comments at 7.

on a revenue basis for those services that would be most difficult to assess on a connection basis.

In this way, the proposal clearly would satisfy the requirements of section 254(d).”⁹

B. A Revenues-Based Mechanism will not Ensure Sustainability of the Federal Universal Service Fund.

USTA advocates allowing carriers that provide only interstate long distance service to contribute to universal service based on revenues because this resolves the problem that interexchange carriers (IXCs) contend they have in identifying information as to the number and capacity of connections that IXCs’ end-user customers have to the network while continuing to provide an equitable and nondiscriminatory basis on which contributions to universal service will be assessed on all providers of interstate telecommunications services. Some commenters have suggested that if a revenues-based mechanism is needed to complement a connections-based mechanism, then a connections-based mechanism should not be necessary at all.¹⁰ Such suggestions ignore that in the highly competitive and ever-changing telecommunications market of the twenty-first century, a revenue-based contribution mechanism that conforms to Section 254 is not sustainable. Since 1997, contributions have been assessed on carriers as a percentage of their revenues from their retail interstate telecommunications services. In recent testimony before the Senate Subcommittee on Communications, Commissioner Kathleen Abernathy noted several trends that have combined to put pressure on the current revenues-based USF contribution mechanism. First, Commissioner Abernathy noted that long distance revenues have been flat since about 1997 as a result of price competition and substitution of wireless services and email. Because universal service contributions are assessed only on interstate retail revenues today, this has not allowed for an increase in the revenue base, which has caused the USF

⁹ *Id.*

¹⁰ *See, e.g.,* Supplemental Comments of National Association of State Utility Consumer Advocates at 23.

contribution factor to rise steadily as demand for universal service support has increased.

Second, the Commissioner noted the prevalence of bundled service plans. Popular flat-rate, all-distance pricing plans for voice services are growing. Third, she noted that many carriers offer business customers bundles that include local and long distance voice services, Internet access, and customer premises equipment. These bundles of services are rendering distinctions between interstate and intrastate telecommunications services meaningless and unworkable as a means of collecting USF support.¹¹ Another trend putting pressure on the current revenues-based USF mechanism is the growth of voice-over-Internet protocol services and other services that are sometimes considered information rather than telecommunications services which, as such, are not assessed USF contributions. As bundling and substitution of services continue, it will be increasingly difficult to isolate interstate revenues, and the pressure on universal service will continue to build.

C. The Hybrid Connections-Based Mechanism is the Best Means of Ensuring Equitable and Nondiscriminatory Assessments on all Providers of Telecommunications Services and Sustainability of the Universal Service Fund.

AT&T Corp. (AT&T), Sprint Corporation (Sprint), and WorldCom, Inc. (WorldCom) argue that a hybrid connections-based mechanism is discriminatory because it creates an artificial competitive advantage in favor of vertically integrated carriers – carriers that provide both access and transport as a bundled package.¹² They argue that vertically integrated carriers would be assessed universal service contributions on a flat-rate, non-traffic sensitive basis while

¹¹ Kathleen Q. Abernathy, Written Statement of Kathleen Q. Abernathy, Commissioner, Federal Communications Commission, on Preserving and Advancing Universal Service Before the United States Senate Committee on Commerce, Science and Transportation Subcommittee on Communications (April 2, 2003) at 8.

¹² AT&T Comments at 53; Sprint Comments at 15; WorldCom Comments at 40. *See also* Comments of Choteau Telephone Company, H&B Telephone Communications, Inc.,

the non-vertically integrated carriers – those providing transport only – would be assessed on a volume-sensitive basis. This, they say, would give high-volume, long-distance users an incentive to use a carrier that provides both access and transport rather than to procure transport from a non-vertically integrated provider because such customers could determine the break-even point between the connections-based charge applied by the carrier providing both access and transport and the revenues-based charge applied by the carrier providing transport only.¹³

While there may be some validity to this argument, non-vertically integrated providers would likely not suffer to the degree some commenters would have us believe. More and more, wireline services are becoming less time and distance-sensitive. Companies such as Verizon¹⁴ and MCI¹⁵ are offering packages that include local and long distance service for a single price. There is nothing in the hybrid connections-based mechanism to stop other companies from following suit and offering local and long distance service as part of a package.

Among the alternatives, the hybrid connections-based mechanism is preferable. As discussed above, an interstate revenues-based contribution mechanism cannot ensure the long term sustainability of the universal service fund.¹⁶ A mechanism that bases contributions on telephone numbers is unworkable because interexchange carriers do not have assigned telephone numbers for their interstate toll services and; therefore, they would not contribute equitably to universal service if a contribution mechanism based on telephone numbers were adopted.¹⁷ A

Moundridge Telephone Company, Inc., Pine Telephone Company, Inc., Pioneer Telephone Associations, Inc., and Totah Telephone Company, Inc., Twin Valley Telephone, Inc. at 19.

¹³ See also Comments of The American Public Communications Council at 23 (arguing that the hybrid connections-based mechanism would drive pay phone service providers and other low-volume users of long distance to use separate providers when their preference might be to use a single provider for both access and transport).

¹⁴ See http://www.verizon.com/foryourhome/sas/res_cat_VZPackages.asp.

¹⁵ See <http://www.mci.com>.

¹⁶ See also USTA Comments at 3.

¹⁷ See *Id.* at 5.

connections-based mechanism that would assess a flat fee on carriers only having physical connections relieves IXC's of the obligation to contribute to universal service.¹⁸ A variation on the hybrid connections-based mechanism could be to assess transport-only providers on a flat-rate, connections basis, rather than on a revenue basis. This variation, however, has been criticized by IXC's who say that it would be difficult to implement because IXC's do not have access to necessary information regarding the number and capacity of the connections their customers have to the network and that they cannot easily obtain this information from local exchange carriers. Of the alternatives available, then, the hybrid connections-based mechanism is the best for assessing USF contributions on all providers of interstate telecommunications services on an equitable and nondiscriminatory basis as required by section 254(d) of the 1996 Act and for ensuring sustainability of universal service.

D. Contributions Based on the Price Elasticity of Carriers' Interstate Telecommunications Services is Inappropriate

Nextel Communications, Inc. (Nextel) argues that the demand for wireless service is highly elastic while the demand for wireline service is inelastic and that the least distortional USF contributions policy is one that has the most inelastic services pay the greatest portion of funding.¹⁹ Similarly, j2 Global Communications, Inc. (j2) argues that any change to the current system should be representative of the principles of Ramsey pricing.²⁰ Nextel and j2's premise is incorrect: Wireline service is not inelastic. More and more wireline customers are substituting wireless for wireline service. Almost one in five Americans use their cell phone as their primary

¹⁸ *Id.*

¹⁹ *See also* Nextel Comments at 19-21.

²⁰ *See* j2 Comments at 7. The theory behind Ramsey pricing is that prices to different groups are set at varying levels above incremental costs depending on the demand elasticities of the group. Those groups with an inelastic demand are charged higher prices than those with an elastic demand.

telephone.²¹ Significantly more Americans are expected to follow suit in the next five to ten years.²² Non-switched broadband service is widely available to end users from local exchange carriers and cable service providers, and it supports voice telephony service offered by service providers unaffiliated with the broadband provider. For example, Vonage Digital Voice, a company that markets itself as “the Broadband Phone Company,” offers unlimited local, regional, and domestic long distance service plus service to Canada for \$39.99 a month to customers that have preexisting broadband Internet access.²³ The cable industry is adding 100,000 new voice telephony customers every month.²⁴ Cox Communications (Cox), a major cable service multi-system operator is now the twelfth-largest “telephone company” in the nation.²⁵ Cox prices cable telephony at ten percent below the local exchange provider in many locales. In Omaha, Nebraska, for example, Cox charges \$15.89 for the first residential line while the local exchange provider charges \$18.15.²⁶ Price elasticity for telephone company-provided wireline voice service might be lower than it is for wireless carriers, but any difference in elasticity is fast disappearing as the wireline voice market is increasingly subject to vigorous competition, especially from wireless providers. Furthermore, to the extent there are differences in elasticity, they are accounted for by the hybrid connections-based contribution mechanism. Once a wireless provider loses a customer, the wireless provider loses the connection and the basis for a universal service assessment. To the extent that a wireless carrier’s contribution

²¹ Michelle Kessler, *18% See Cell Phones as Their Main Phones*, USA Today (Jan. 31, 2002), at <http://www.usatoday.com/money/tech/2002-02-01-cell-phones.htm>.

²² *Id.*

²³ See www.vonage.com.

²⁴ Reinhardt Krause, *Cable’s Program Extends Beyond TV, Voice Via Cable Gains, AT&T Broadband, Cox Have Taken Small Share Away From Local Bells*, Investor’s Business Daily, May 16, 2002, at 6. AT&T Broadband and Cox are reported to be signing up 1.25 million new telephone customers annually.

²⁵ Jane Black, *Cox: Flying High – and Solo?*, BusinessWeek Online, (Jan. 31, 2002), at http://www.businessweek.com/bwdaily/dnflash/jan2002/nf20020131_3093.htm.

obligation varies with the number of connections it gains or loses, any difference in price elasticity between wireless service and wireline service is irrelevant since the wireless carrier's universal service obligation varies in relationship to changes in the number of its connections.

Applying the principles of Ramsey pricing to a universal service contribution mechanism is inappropriate. The adoption of a contribution mechanism pursuant to Section 254(d) has absolutely nothing to do with the concept of loading more costs on consumers who need a service and have fewer alternatives to that service (Ramsey pricing). The task of adopting a universal service contribution mechanism must be about the adoption of a fair and equitable distribution of the responsibilities imposed by Section 254(d) on all providers of interstate telecommunications services. Further, USTA submits that all providers of interstate telecommunications, including all providers of broadband, should also contribute to the support of universal service. As the National Rural Telecom Association (NRTA) and the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) point out, the "[f]ailure to assess all facilities-based broadband Internet access providers perpetuates an unwarranted competitive disadvantage for wireline providers that is already distorting the marketplace."²⁷

E. The Hybrid Connections-Based Mechanism Does Not Require IXC's to Incur Additional Billing Costs

AT&T, Sprint, and WorldCom complain that under the hybrid connections-based mechanism, the non-vertically integrated IXC must bear the costs of billing zero- and low-volume customers that it would not normally bill on a monthly basis.²⁸ They say that the long-distance provider would have to generate a monthly bill either incurring an additional billing

²⁶ See <http://www.cox.com/Omaha.Telephone/Telephone%20Savings%20Calculator.asp>.

²⁷ Comments of NRTA and OPASTCO at 12.

²⁸ AT&T Comments at 47; Sprint Comments at 13; WorldCom Comments at 41.

expense solely attributable to universal service or bill customers in a multi-month bill, which creates customer confusion and the appearance of high line charges. Nothing in the hybrid connections-based mechanism, however, dictates when carriers bill their customers. Under the hybrid connections-based mechanism, IXC's that only provide transport contribute to universal service based on their receipt of applicable revenues, whenever that may be.

III. CONCLUSION

USTA urges the FCC to adopt the hybrid connections-based mechanism, which assesses USF contributions based on carriers' provision of access and transport services and allows contributions to be made on a revenues-basis in limited circumstances. USTA maintains that this mechanism is the best means for sustaining the universal service fund and ensuring adherence to the statutory requirement that USF contributions be assessed in an equitable and nondiscriminatory manner on all carriers providing interstate telecommunications services.

Respectfully submitted,
UNITED STATES TELECOM ASSOCIATION



By: _____

Lawrence E. Sarjeant
Indra Sehdev Chalk
Michael T. McMenamin
Robin E. Tuttle

Its Attorneys

1401 H Street, NW, Suite 600
Washington, D.C. 20005
(202) 326-7300

April 18, 2003

CERTIFICATE OF SERVICE

I hereby certify that a copy of Reply Comments of the United States Telecom Association was served on this 18th day of April 2003 by electronic delivery or first class, postage prepaid mail to the persons listed below.



By: _____
Indra Sehdev Chalk

SERVICE LIST

Alan R. Shark
American Mobile Telecommunications Assoc.
1150 18th Street, NW, Suite 250
Washington, DC 20036

Ruth Milkman
A. Renée Callahan
Lawler, Metzger & Milkman
2001 K Street, NW, Suite 802
Washington, DC 20006

Allan C. Hubbard
Robert N. Felgar
Dickstein, Sahpiro, Morin & Oshinsky
2101 L Street, NW
Washington, D.C. 20037

Katie King
Federal Communications Commission
445-12th Street, SW
Room 5B544
Washington, DC 20554

Barbara Meisenheimer
Missouri Office of Public Counsel
301 West High St., Suite 250
Truman Bldg
P.O.B 7800
Jefferson City, MO 65102

John E. Welch
EPIK Communications Inc.
3501 Quadrangle Blvd., Suite 225
Orlando, FL 32779

Carl Johnson
New York Public Service Commission
3 Empire State Plaza
Albany, NY 12223-1350

J.R. Carbonell
Carol L. Tacker
Cingular Wireless LLC
5565 Glenridge Connector
Suite 1700
Atlanta, GA 30342

Charles C. Hunter
Catherine M. Hannan
Hunter Communications Law Group
1424 Sixteenth Street, NW, Suite 105
Washington, DC 20036

Richard A. Askoff
National Exchange Carrier Association,
Inc.
80 South Jefferson Rd.
Whippany, NJ 07981

Cleo Fields
Rainbow/PUSH Coalition
1131 8th Street, NW
Washington, DC 20002

Angela N. Brown
Richard M. Sbaratta
BellSouth Corporation
675 West Peachtree Street, NE
Atlanta, GA 30375

Commissioner Jonathan S. Adelstein
Federal Communications Commission
445-12th Street, SW
Room 8-C302
Washington, DC 20554

James E. Graf
Kristen Neller Verderame
BT North America Inc.
601 Pennsylvania Avenue, NW
North Building, Suite 625
Washington, DC 20004

Commissioner Kathleen Abernathy
Federal Communications Commission
445-12th Street, SW
Room 8-B115H
Washington, DC 20554

Robert W. Quinn
AT&T
Suite 1000
1120 20th St. NW
Washington, DC 20036

Commissioner Kevin Martin
Federal Communications Commission
445-12th Street, SW
Room 8-B115
Washington, DC 20554

Russell M. Blau
Tamar E. Finn
Swidler Berlin Shereff Friedman, LLP
(Network)
3000 K Street, NW Suite 300
Washington, DC 20007-5116

Craig J. Brown
Sharon J. Devine
Qwest Communications International Inc.
1020 19th Street, NW, Suite 700
Washington, DC 20036

Tom Wilson
Washington Utilities & Transportation
Commission
1300 Evergreen Park Drive, S.W.
P.O.B 47250
Olympia, WA 98504-7250

D. Scott Barash
Cheryl L. Parrino
Robert Haga
Universal Service Administrative Company
2120 L Street, NW
Suite 600
Washington, DC 20037

David L. Hill
Audrey P. Rasmussen
Hall, Estill, Hardwick Gale, Golden &
Nelson, P.C.
1120 20th Street, NW, Suite 700
Washington, D.C. 20036

Daniel Gonzalez
Federal Communications Commission
445-12th Street, SW
Room 8-A204
Washington, DC 20554

David M. Wilson
Leon M. Bloomfield
Wilson & Bloomfield LLP
1901 Harrison Street, Suite 1630
Oakland, CA 95612

David Dowds
Florida Public Service Commission
2540 Shumard Oaks Blvd
Gerald Gunter Bldg.
Tallahassee, FL 32399-0850

Susan Stevens Miller
Assistant General Counsel
Maryland Public Service Commission
16th Floor 6 Paul Street
Baltimore, MD 21202-6806

Diane Law Hsu
Federal Communications Commission
445-12th Street, SW
Room 6A360
Washington, DC 20554

Jeff Pursley
Nebraska Public Service Commission
300 The Atrium, 1200 N Street
P.O. Box 94927
Lincoln, NE 68509-4927

Douglas I. Brandon
AT&T Wireless Services, Inc.
1150 Connecticut Avenue, NW
Washington, DC 20036

Joseph DiBella
Verizon
1320 North Court House Road
Eighth Floor
Arlington, VA 22201

Earl Poucher
Office of the Public Counsel
111 West Madison, Rm. 812
Tallahassee, FL 32399-1400

Stuart Polikoff
Jeffrey W. Smith
Stephen Pastorkovich
OPASTCO
21 Dupont Circle NW
Suite 700
Washington, DC 20036

Geoff Waldau
Federal Communications Commission
445-12th Street, SW
Room 5B524
Washington, DC 20554

Anita Cheng
Federal Communications Commission
445-12th Street, SW
Room 5A445
Washington, DC 20554

Harvey L. Buchanan, Jr.
Office of Telecommunications
Florida State University
Rod K. Shaw Building
Tallahassee, FL 32306

Helen E. Disenhaus
Douglas D. Orvis II
Swidler Berlin Shereff Freidman
3000 K Street, NW
Suite 300
Washington, DC 20007

James P. Young
Sidley Austin Brown & Wood
1722 I Street, NW
Washington, Dc 20006

Robert S. Tongren
NASUCA
8300 Colesville Rd, Suite 101
Silver Spring, MD 20910

James R. Langenberg
Iowa Utilities Board
350 Maple Street
Des Moines, IA 50319

Rick Zucker
6360 Sprint Parkway, KSOPHE302
Overland Park, KS 66251

James S. Blaszak
Stephen J. Rosen
Levine, Blaszak, Block & Boothby LLP
2001 L Street, NW, Suite 900
Washington, D.C. 20036

Joel B. Shifman
Maine PSC
242 State Street
Augusta, ME 04333

Jennifer A. Gilmore
Indiana Utility Regulatory Commission
Indiana Govt. Center South
302 West Washington, Street, St. #306
Indianapolis, IN 46204

Ann Dean
Maryland Public Service Commission
16th Floor, 6 Paul Street
Baltimore, MD 21202-6806

Jerry J. Gumpel
Sheppard, Mullin Richter & Hampton LLP
510 West Broadway, 19th Floor
San Diego, CA 92101

Mark C. Rosenblum
Judy Sello
Lawrence J. Lafaro
AT&T Corp
Room 13A229
One AT&T Way
Bedminster, NJ 07921

Joel S. Winnik
David L. Sieradzki
Hogan & Hartson LLP
Columbia Square
555 Thirteenth St. NW
Washington, DC 20004

Howard J. Symons
Sara F. Leibman
Bryan T. Bookhard
Mintz, Levin Cohn, et al
701 Pennsylvania Avenue, NW; Suite 900
Washington, DC 20004

John T. Nakahata
Michael G. Grable
Harris Wiltshire & Grannis LLP
1200 Eighteenth Street, NW, Suite 1200
Washington, DC 20036

Robert J. Hanson
Colin M. Alberts
Verestar, Inc.
3040 Williams Drive
Suite 600
Fairfax, VA 22031

John T. Scott
Anne E. Hoskins
Lolita D. Smith
Verizon Wireless
1300 I Street, NW, #400 West
Washington, DC 20005

Jennifer Schneider
Federal Communications Commission
445-12th Street, SW
Room 6C212
Washington, DC 20554

Kenneth E. Hardman
Moir & Hardman
1015 – 18th Street, NW, Suite 800
Washington, Dc 20036-5204

Eric Einhorn
Federal Communications Commission
445-12th Street, SW
Room 5A441
Washington, DC 20554

Larry M. Stevens
Iowa Utilities Board
350 Maple Street
Des Moines, Iowa 50319

Jason E. Friedrich
Dow, Lohnes & Alberston, PLLC
1200 New Hampshire Avenue, NW
Suite 800
Washington, D.C. 20036

Laurie Pappas
Texas PUC
1701 North Congress Avenue
Suite 9-180
P.O. Box 12397
Austin, TX 78711

L. Marie Guillory
National Telecommunications Cooperative
Association
4121 Wilson Blvd, 10th Floor
Arlington, VA 22203

Lawrence W. Katz
Michael E. Glover
Edward Shakin
c/o Verizon
1515 North Court House Rd., Suite 500
Arlington, VA 22201-2909

Lee L. Selwyn
Economics and Technology Inc.
Suite 400
Two Center Plaza
Boston, MA 02108

Leonard J. Kennedy
Lawrence R. Krevor
Garnet M. Goins
Nextel Communications, Inc.
2001 Edmund Halley Drive
Reston, VA 20191

Elizabeth R. Sachs, Esq.
Lukas, Nace, Gutierrez & Sachs
1111 19th Street, NW, Suite 1200
Washington, D.C. 20036

Lila Jaber
Commissioner
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald Gunter Building
Tallahassee, FL 32399

Billy Jack Gregg
Consumer Advocate Division
723 Kanawha Blvd. East
7th Floor, Union Bldg
Charleston, WV 25301

Margot Smiley Humphrey
Holland & Knight
2100 Pennsylvania Avenue, NW
Suite 100
Washington, DC 20006

Chairman William K. Powell
Federal Communications Commission
445-12th Street, SW
Room 8-B201
Washington, DC 20554

Mary E. Newmeyer
Alabama PSC
100 North Union Street
Suite 800
Montgomery, AL 36104

Hope Halpern Barbulescu
Telstar International Inc.
1 North Broadway
Whit Plains, NY 10601

Mathew Brill
Federal Communications Commission
445-12th Street, SW
Room 8-B115
Washington, DC 20554

Jeremy Denton
Robin Landis
Industrial Telecommunications Association
Inc.
1110 N. Glebe Rd. Suite 500
Arlington, VA 22201

Michael A. Cox
David A. voges
Steven D. Hughey
Michael A. Nickerson
Michigan Public Service Commission
6545 Mercantile Way, Suite 15
Lansing, MI 48911

Susan M. Gately
Economics and Technology, Inc.
Two Center Plaza, Suite 400
Boston, MA 02108

Michael C. Strand
Montana Independent Telecommunications
Systems
P.O. Box 5239
Helena, MT 59604

Susan Sanborn
Western Kentucky University
1 Big Red Way
116 Van Meter Hall
Bowling Green, KY 42101

Michael F. Altschul
Andrea D. Williams
Cellular Telecommunications & Internet
Association
1250 Connecticut Avenue, NW, Suite 800
Washington, DC 20036

Mr. Greg Fogleman
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gerald Gunter Bldg.
Tallahassee, FL 32399-0850

Michael G. Hoffman
Patricia Zacharie
VarTec Telecom, Inc.
1600 Viceroy Dr.
Dallas, TX 75235

William Scher
Federal Communications Commission
445-12th Street, SW
Room 5B550
Washington, DC 20554

Michael H. Lee
Montana Public Service Commission
1701 Prospect Avenue
PO. Box 202601
Helena, MT 59620-2601

Danny E. Adams
Andrea P. Edmonds
Kelley Drye & Warren LLP
8000 Towers Crescent Drive
Suite 1200
Vienna, VA 22182

Mitchell F. Brecher
Nancy E. Boocker
Debra A. McGuire
GreenBerg Traurig, LLP
800 Connecticut Avenue, NW, Suite 500
Washington, DC 20006

John A. Predergast
Gerard J. Duffy
Blooston, Mordkofsky, Dickens et al
2120 L Street, NW, Suite 300
Washington, DC 20037

Mr. Thomas Dunleavy
New York State Public Service Commission
3 Empire State Plaza
Albany, NY 12223-1350

Lisa Zaina
Federal Communications Commission
445-12th Street, SW
Room 8-A302
Washington, DC 20554

Narda Jones
Federal Communications Commission
445-12th Street, SW
Room 5B552
Washington, DC 20554

The Honorable Martha Hogerty
Missouri Office of Public Counsel
301 West High St. #250
Truman Building
POB 7800
Jefferson City, MO 65102

Paul Garnett
Federal Communications Commission
445-12th Street, SW
Room 5A623
Washington, DC 20554

Thomas M. Koutsky
Claudia J. Earls
Z-Tel Communications Inc.
601 S. Harbour Island Blvd. #220
Tampa, FL 33602

Peter A. Pescosolido
Connecticut Dept. PUV
10 Franklin Sq.
New Britain, CT 06051

Commissioner Michael J. Copps
Federal Communications Commission
445-12th Street, SW
Room 8-B115
Washington, DC 20554

Peter Bluhm
Vermont Public Service Board
Drawer 20
112 State St., 4th Floor
Montpellier, VT 05620

Brad Ramsay
NARUC
1101 Vermont Avenue, NW, Suite 200
Washington, D.C. 20005

Peter Lurie
Vice President & General Counsel
Virgin Mobile USA, LLC
10 Independence Blvd.
Warren, NJ 07059

Carol Matthey
Federal Communications Commission
445-12th Street, SW
Room 5C451
Washington, DC 20554

Philip L. Verveer
David M. Don
Willkie Farr & Gallagher
1875 K Street, NW
Washington, DC 20006

Bryan Clopton
Federal Communications Commission
445-12th Street, SW
Room 5A465
Washington, DC 20554

Richard Juhnke
Jay C. Keithley
Norina T. Moy
Marybeth Banks
Sprint Corporation
401 9th Str. NW #400
Washington, DC 20004

Dana Walton-Bradford
Federal Communications Commission
445-12th Street, SW
Room 5A314
Washington, DC 20554

Richard S. Whitt
Alan Buzacott
Lori Wright
WorldCom, Inc.
1133 19th Str. NW
Washington, DC 20036

Lori Kenyon
Regulatory Commission of Alaska
701 W 8th Avenue, Suite 300
Anchorage, AK 99501

Robert J. Aamoth
Heather M. Wilson
Kelley Drye & Warren LLP
1200 19th Street, NW, Suite 500
Washington, DC 20036

Charlie Bolle
Nevada Public Utilities Commission
1150 E. Williams Street
Carson City, NV 89701-3105

Rowland Curry
Texas Public Utility Commission
1701 North Congress Avenue
POB 13326
Austin, TX 78701-3326

John Harwood
Russell Hanser
Wilmer, Cutler & Pickering
2445 M Street, NW
Washington, DC 20037

Shannon Lipp
Federal Communications Commission
445-12th Street, SW
Room 5A523
Washington, DC 20554

The Honorable Laska Schoenfelder
Commissioner, State Joint Board Chair
South Dakota Public Utilities Commission
State Capital, 500 East Capital Street
Pierre, SD 57501-5070

Sharon Webber
Federal Communications Commission
445-12th Street, SW
Room 5A425
Washington, DC 20554

Jordan Goldstein
Federal Communications Commission
445-12th Street, SW
Room 8-A307
Washington, DC 20554

Susan Bahr, PC
P.O. Box 86089
Montgomery Village Avenue
Rockville, MD, 20886

James A. Burg, Chairman
South Dakota Public Utilities Commission
State Capital, 500 East Capital Street
Pierre, SD 57501-5070

Sylvia Lesse
Kraskin, Lesse & Casson LLP
2120 L Street, NW #520
Washington, DC 20037

Frederic G. Williamson
President
Fred Williamson & Associates, Inc.
2921 East 91st Street, Suite 200
Tulsa, OK 74137

The Honorable Bob Rowe
Commissioner
Montana Public Service Commission
1701 Prospect Avenue
PO. Box 202601
Helena, MT 59620-2601

Christopher Libertelli
Federal Communications Commission
445-12th Street, SW
Room 8-B201
Washington, DC 20554

The Honorable Nanette G. Thompson
Chair
Regulatory Commission of Alaska
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501-1693

Philip McClelland
PA Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Thomas Jones
Wilkie Farr & Gallaher
3 Lafayette Center
1155 21st St. N.W.
Washington, D.C. 20036

Keith Oliver
Home Telephone Inc.
P.O. Box 1194
Moncks Corner, SC 29461

William Maher
Federal Communications Commission
445-12th Street, SW
Room 5C450
Washington, DC 20554

Jeanne Jansenius
ACUTA Inc.
152 W. Zandale Drive
Suite 200
Lexington, KY 40503

David C. Bergmann
Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215

Jeffry A. Brueggeman
Gary L. Phillips
Paul K. Mancini
SBC Communications Inc.
1401 Eye Street, NW, Suite 400
Washington, D.C. 20005

Roger B. Borgelt
Assistant Attorney General
Consumer Protection Div.
Public Agency Representation Section
P.O. Box 12548
Austin, TX 78711-2548

Nancy J. Bloch
National Association of the Deaf
814 Thayer Avenue
Silver Spring, MD 20910-4500

James A. Bachtell
Angela J. Campbell
Institute for Public Representation
Georgetown Univ. Law Center
600 New Jersey Ave. NW
Washington, DC 20001

Carolyn Groves
Brian W. Higgins
Wikinson Barker Knauer, LLP
2300 N Street, N.W., Suite 700
Washington, DC 20037-1128

John Cheek
National Indian Education Association
700 North Fairfax Street
Suite 210
Alexandria, VA 22314

Laura H. Phillips
Laura S. Gallagher
Drinker Biddle & Reath LLP
1500 K Street, NW
Suite 1100
Washington, DC 20005-1209

Eric E. Menge
Tom Sullivan
Radwan Saade
Office of Advocacy, U.S. Small Business
Administration
409 Third St., S.W.
Suite 7800
Washington, DC 20416

Dirck A. Hargraves
Telecommunications Research & Action
Center
Post Office Box 27279
Washington, DC 20005

Derrick Span
Luis Arteaga
Community Action Partnership
1100 17th Street
Washington, DC 20036



